

**Your
Seattle
City Light**

Randall W. Hardy, Superintendent
Charles Royer, Mayor

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KING COUNTY

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INTERNATIONAL
AIRPORT



October 26, 1984

Ms. Margo Partridge
U.S. Environmental Protection Agency
1200 Sixth Avenue
Seattle, WA 98101

Dear Ms. Partridge:

Since March of this year, Seattle City Light has been testing the soils in the vicinity of the Georgetown Steam Plant. We have kept you informed of sampling results, as we have received them. We now know the approximate horizontal extent of PCB contamination in the southwest property corner depression. We also have some limited information (from other's testing) about contamination of sediments in the flume. As you know, the flume receives surface and coolant water from adjacent properties. Some of the water which flows into the flume is authorized by City Light, but some is not.

The following is our proposal for interim remedial actions for both the flume and the southwest corner depression. It is our judgment, that in both cases, it is more appropriate to stabilize the sites, rather than clean up at this time. The following are the reasons we propose to postpone cleanup until spring 1985.

Neither City Light's testing, nor the testing of other parties has revealed a source (or any sources) of PCBs. We realize that further investigation may not define a source. However, we think that more testing is warranted in order to minimize the potential recontamination risk, and to more clearly define the remedial efforts which must be taken.

Because the fall season is here, we propose to wait to do any earth moving in the southwest corner depression. We anticipate cleanup of that area by excavating and disposing contaminated sediment and fill. We believe it is best to do this in phases, with testing after each removal phase until acceptable background levels are documented. At this time of year, the probability of a storm is great enough that if we began earth moving, we could risk the spread of contamination by surface runoff. Also, given that unauthorized use of the flume is being made by some parties, it will take additional time to resolve the appropriate course of action.

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In another effort to avoid any recontamination after cleanup, we propose cleaning the southwest corner depression at the same time Boeing cleans their storm drain system. Assuming that tidal flow is prevented, cleanup should proceed in an upstream to downstream direction, with the cleanup of the flume being last. We propose initiating our work in the spring, as soon as we anticipate a few weeks of dry weather. City Light's PCB consultant, Tetra Tech, concurs in the assessments described above.

Our remedial action proposal consists of three phases: (1) site stabilization, to be completed this fall; (2) interim monitoring and testing for a PCB source, through the winter; and (3) cleanup, to begin next spring. These actions are more fully described below.

Stabilization

To prevent migration by surface runoff and minimize leaching movement of PCBs in the southwest corner depression, we have installed a plastic covering. The sheet covers an area about 100 feet (north-south) by 350 feet (east-west), along the fence-lines, including the entire ditch which flows along the south property boundary. It is held in place on the north and east by the perimeter soil. This soil has been tested and contains less than one ppm PCB. On the south and west, it is retained by the fill material of the driveway to Boeing buildings. This concept was discussed with you, DOE, and Metro at the meeting at your headquarters' on October 9, 1984, and was satisfactory to you at that time.

< City Light asked King County to divert surface runoff from north of the airport landing strip, so as to minimize the flow of water down the drainage ditch. King County has done this.

It appears that sediment is not being transported, due to the gentle slope of the flume. However, to prevent the risk of contaminated sediments from moving along the bottom of the flume and discharging into Slip 4 of the Duwamish Waterway, we propose to install a series of sediment-control structures. These structures, which may be weirs, will trap and store sediments which may be moving downstream.

We are investigating the feasibility of installing an activated carbon filter downstream of the weirs. The filter would absorb dissolved contaminants. However, we do not expect to see dissolved PCB in the water, but we will have discharge sample results by next week.

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Interim Sampling

The sampling we propose consists of monitoring discharge water and further investigation to ascertain a contamination source. We intend to monitor the water that discharges from the flume to Slip 4 on a monthly interval. Samples will be collected at low tide. They will be analyzed to ensure compliance with the DOE standard of 0.01 ppm PCB.

Meanwhile, we will continue sampling to better define the vertical extent of contamination in the southwest corner depression. We will also continue, in cooperation with the Boeing Company, to look for a source of the contamination.

Cleanup

We propose to work with you, the Washington DOE, and with Boeing, to draw up a clean-up plan. We suggest excavating contaminated material from the southwest corner depression. We must coordinate the scheduling of a hydraulic-method cleanup of the storm drain system on Boeing property and the parts of the flume that contain contaminated sediments. As a part of the clean-up plan, we will include a monitoring schedule.

At this time, we do not intend to discuss the issue of legal liability for cleanup of the PCB contamination. We do not feel that sufficient evidence exists to point to any source or cause of the contamination, at either the depression or the drainage system and flume.

We are sending a copy of this proposal to Mr. Gary Brugger, of the Northwest Regional Office of the Washington DOE. We would like your and Mr. Brugger's comments on the proposals of this letter at your earliest convenience.

Sincerely,



Timothy C. Croll, Acting Director
Environmental Affairs Division

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Margo Partridge
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